

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE:

WILLIAM M VERNON  
SUZANNE VERNON

CASE NO. 15-55273

CHAPTER 13

DEBTOR

JUDGE JOHN E. HOFFMAN JR.

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**OBJECTION TO CONFIRMATION**

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Faye D. English, Chapter 13 Trustee and objects to confirmation of the plan and would show this Court that in the above-referenced case the Court should enter an order denying confirmation for the reasons set forth below and dismissing the case pursuant to 11 USC §1307(c) for the following:

- X The Chapter 13 Statement of Financial Affairs, Plan, Means Test, or Schedules must be amended to reflect the changes in the following areas: Plan fails to include treatment for the IRS lien disclosed on Schedule D. Schedule I fails to include a statement disclosing gross business income and itemized expenses, as required by Line #8a of the form. Schedule J fails to disclose any self-employment taxes for Mr. Monthly operating reports from filing to confirmation are needed.
- X The Chapter 13 Plan must be amended to pay to the required applicable commitment period of U.S.C. § 1325 (b)(4). The Plan projects 76 months.
- X The Debtors have not filed their Federal and/or State income tax return for the following year(s): 2010, 2012, and 2014 Federal returns, signed copies of returns are needed.. Therefore the Debtors are not able to meet the burden of proving that the Plan complies with 11 U.S.C. § 1322 (a)(2).
- X An appraisal is needed. 60-day pay advices from Mrs.' new employer is needed. 2013 tax return is needed.

Wherefore, the Trustee prays the Court deny confirmation for the reasons set forth and the case be dismissed or converted to Chapter 7, whichever shall be determined in the creditor's best interest.

Dated: 9/30/2015

Respectfully submitted,

/s/ Faye D. English

Faye D. English  
Chapter 13 Trustee  
One Columbus  
10 West Broad St., Suite 900  
Columbus, OH 43215-3449  
Telephone: 614-420-2555  
Facsimile: 614-420-2550

<b>CERTIFICATE OF SERVICE</b>
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I hereby certify that a copy of the foregoing Objection To Confirmation was served on the following registered ECF participants, electronically through the Court's ECF System at the e-mail address registered with the Court, or by ordinary U.S. mail, postage prepaid, on this date.

Dated 9/30/2015

/s/ Faye D. English

Electronically signed by  
Faye D. English, Chapter 13 Trustee

By the Court's ECF System:

Asst. U.S. Trustee  
Faye D. English, Chapter 13 Trustee  
Courtney A (Perdue) Cousino Esq, Attorney  
for Debtor

By ordinary U.S. Mail addressed to:

William M Vernon  
Suzanne Vernon  
6033 Lambert Rd  
Orient, Oh 43146